

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: VOLKSWAGEN “CLEAN DIESEL”
MARKETING, SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION

MDL 2672 CRB

**DECLARATION OF JENNIFER
KEOUGH REGARDING EXCLUSION
REQUESTS**

This Documents Relates to:

Porsche Gasoline Litigation

The Honorable Charles R. Breyer

1 I, Jennifer Keough, hereby declare and state as follows:

2 I am the Chief Executive Officer and President of JND Legal Administration LLC ("JND"). As
3 the CEO and President of JND, I oversee all facets of our company's operations, including
4 monitoring and implementing our notice and claims administration programs. This Declaration is
5 based on my personal knowledge as well as upon information provided to me by experienced
6 JND employees, and if called upon to do so, I could and would testify competently thereto.

7 **EXCLUSION REQUESTS**

8 This Declaration is to supplement my Declaration dated October 11, 2022. Since that date, one
9 previously deficient opt out is now valid. Therefore, JND is aware of 11 total valid opt-out
10 requests. Attached as **Exhibit A** is a list of all Opt-Out requests received with their status as of
11 October 20, 2022.

12
13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed October 20, 2022, at Seattle, Washington.

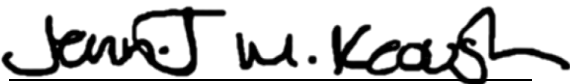
15
16 By: 
17 Jennifer M. Keough

EXHIBIT A



PORSCHE GASOLINE SETTLEMENT
Exclusion Requests
(as of October 20, 2022)

#	Name	VIN	Status
1	MOHAMMAD ALBABA & DANA AL JIJAKLI	2272	Valid
2	CURTIS CHISM	1739	Valid
3	JENNIFER ELLIOTT	5639	Valid
4	ROGER FULLMER	8154	Valid
5	ALLISON KLEIN	2380	Valid
6	GEOFFREY LAI	1626	Valid
7	DAVID MECEY	2039	Valid
8	STEPHEN MARCOM	6259	Valid
9	MICHAEL PODOLL	3316	Valid
10	PHILIP SOUTHWICK	0326,	Valid
11	ANDREA STAMPONE	0239	Valid
12	RICHARD ALFRED	N/A	Deficient
13	NICOLE AVILES	5763	Deficient
14	ERIK BALKAN	6360, 4149, 0197, 0359	Deficient
15	KLAUS M BROWN	8146	Deficient
16	CRISTIANO CAPUZZI	3561	Deficient
17	JEANNETTE CORRERO	3268	Deficient
18	WILLIAM CURTIS	6880	Deficient
19	DONEGAL INSURANCE GROUP/ MICHIGAN INSURANCE	N/A	Deficient
20	TAN DUONG	N/A	Deficient
21	TAMMY HARRIS	5104	Deficient
22	JAMES HARRIS	5104	Deficient
23	PAUL LERMAN/ ATEC LIQUIDATIONS INC DBA ATEC INC	5734, 1429, 3441, 1562, 3281	Deficient
24	JAIME LUNA	N/A	Deficient
25	ANITA MARTINEZ	0331, 8227	Deficient
26	MARICIA REMALEY	N/A	Deficient